



FARUQI & FARUQI
LLP
ATTORNEYS AT LAW

NEW YORK

CALIFORNIA

DELAWARE

GEORGIA

PENNSYLVANIA

Innessa M. Huot
ihuot@faruqilaw.com

November 2, 2020

VIA ECF

The Honorable Roanne L. Mann
United States District Court
Eastern District of New York
225 Cadman Plaza East, Courtroom #13C-S
Brooklyn, New York 11201

Re: *Yelena Ruderman v. Law Office of Yuriy Prakhin, P.C., et al.*,
Civil Action No. 1:19-cv-2987 (RJD)(RLM)

Dear Judge Mann:

We represent Plaintiff Yelena Ruderman in the above-referenced action and write jointly with Defendants, pursuant to Section E of your Honor's Individual Rules, to respectfully request an extension of the November 13, 2020 fact discovery deadline to January 18, 2021 and an extension of the expert discovery from December 23, 2020 to March 5, 2021. *See* Your Honor's August 26, 2020 Order.

The parties have been working diligently to complete discovery in this action, having already exchanged multiple sets of interrogatory responses, responses to requests for admissions, and thousands of records, ESI, and other document production. The parties have already conducted the depositions of both Plaintiff Yelena Ruderman and Defendant Yuriy Prakhin, on September 24, 2020 and October 15, 2020, respectively.

Following Mr. Prakhin's deposition, the parties had a discovery dispute regarding outstanding depositions and specifically 30(b)(6) depositions. The parties exchanged letters and case law to support their respective positions. The parties then met and conferred in good faith and agreed to resolve their dispute cooperatively without seeking court intervention. The parties then immediately sought to reschedule the outstanding depositions, including the two 30(b)(6) designees and five non-party witness depositions. However, with the upcoming holidays, the availability of non-party witnesses proved to be limited. The parties were able to schedule all the outstanding depositions, with the latest deposition to be conducted on December 10, 2020.

Further, the parties anticipate that they will need 35 days to obtain and review the deposition transcripts and exchange post-deposition discovery in lieu of additional deposition testimony. The parties anticipate some transcript recording delays and document production delays to arise over the Christmas holiday and are hoping that the requested extension will provide the parties with adequate time to complete discovery.



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In light of the foregoing, the parties respectfully request that they be permitted until January 18, 2021 to complete fact discovery and until March 5, 2021 to complete expert discovery. This is Plaintiff's third request for an extension of the discovery deadline. Your Honor granted Plaintiff's two prior requests.

We thank the Court for its time and attention to this matter.

Respectfully submitted,

A handwritten signature in blue ink, appearing to read 'Innessa M. Huot', written over a light blue rectangular background.

Innessa M. Huot

Cc: Counsel of Record (*via* ECF)